

Steve W. Berman (*pro hac vice*)
 Thomas E. Loeser (Cal. Bar No. 202724)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Tel: (206) 623-7292 / Fax: (206) 623-0594
 steve@hbsslaw.com
 toml@hbsslaw.com

Peter B. Fredman (Cal. Bar No. 189097)
 LAW OFFICE OF PETER FREDMAN PC
 125 University Ave, Suite 102
 Berkeley, CA 94710
 Tel: (510) 868-2626 / Fax: (510) 868-2627
 peter@peterfredmanlaw.com

*Attorneys for Plaintiff AMIRA JACKMON
 and persons similarly situated*

Timothy G. Blood (Cal. Bar No. 149343)
 Thomas J. O'Reardon II (Cal. Bar No. 247952)
 BLOOD HURST & O'REARDON LLP
 600 B. Street, Suite 1550
 San Diego, CA 92101
 Tel: (619) 338-1100 / Fax: (619) 338-1101
 tblood@bholaw.com
 toreardon@bholaw.com

*Attorneys for Plaintiff PHILLIP R. CORVELLO,
 and persons similarly situated*

Matthew G. Ball (Cal. Bar No. 208881)
 matthew.ball@klgates.com
 K&L GATES LLP
 Four Embarcadero Center, Suite 1200
 San Francisco, CA 94111
 Tel: (415) 882-8200/ Fax: (415) 882-8220

Irene C. Freidel (*pro hac vice*)
 irene.freidel@klgates.com
 Jennifer J. Nagle (*pro hac vice*)
 jennifer.nagle@klgates.com
 David D. Christensen (*pro hac vice*)
 david.christensen@klgates.com
 Matthew N. Lowe (*pro hac vice*)
 matthew.lowe@klgates.com
 K&L GATES LLP
 State Street Financial Center
 One Lincoln Street
 Boston, MA 02111-2950
 Tel: (617) 261-3100 / Fax: (617) 261-3175

*Attorneys for Defendant
 WELLS FARGO BANK, N.A. d/b/a
 AMERICA'S SERVICING COMPANY*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

PHILLIP R. CORVELLO, On Behalf of
 Himself and All Others Similarly Situated,

 Plaintiff,

v.

WELLS FARGO BANK N.A. d/b/a
 WELLS FARGO HOME MORTGAGE
 d/b/a AMERICA'S SERVICING
 COMPANY,

Defendant.

AMIRA JACKMON, individually, and on
 behalf of others similarly situated,

Plaintiff,

v.

AMERICA'S SERVICING COMPANY
 and WELLS FARGO BANK, N.A.,

Defendant.

Case No. 10-cv-05072 VC

CLASS ACTION

STIPULATION AND ~~PROPOSED~~ ORDER TO MODIFY DEADLINE TO FILE MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Case No. 11-cv-03884 VC

1 **PLEASE TAKE NOTICE** that plaintiffs Phillip R. Corvello and Amira Jackmon
2 (collectively, “Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”)
3 (collectively, the “Parties”), by and through their respective counsel, stipulate and agree as
4 follows:

5 WHEREAS, on May 9, 2017, the Parties filed a joint letter with the Court reporting
6 that they had reached a settlement in principle of both the class and individual claims in the
7 *Jackmon* and *Corvello* actions [*Corvello* ECF No. 206];

8 WHEREAS, on May 10, 2017, the Court stayed all presently accruing filing deadlines
9 and continued all remaining pretrial and trial dates, and ordered that Plaintiffs’ motion for
10 preliminary approval of the class settlement be filed by June 9, 2017 [*Corvello* ECF No. 209].
11 Thereafter, the Court granted a two-week extension request and ordered that Plaintiffs’ motion
12 for preliminary approval of the class settlement be filed by June 23, 2017 [*Corvello* ECF No.
13 211];

14 WHEREAS, the Parties have continued to diligently and in good faith, and on an
15 almost daily basis, draft and negotiate the terms and provisions of the individual and class
16 settlement agreements, the exhibits to the class settlement agreement, work with a potential
17 claims administrator to prepare for the proposed class notice and settlement administration
18 process, and evaluate potential, proposed *cy pres* recipients; and

19 WHEREAS, the Parties require limited, additional time to adequately and
20 appropriately prepare the agreements and moving papers, including the multiple supporting
21 declarations, for the Court’s preliminary approval consideration. Although the Parties
22 anticipate that the settlement agreements may be signed by June 23, 2017, they have agreed to
23 submit a joint motion, which requires additional coordination and approval. In order to
24 adequately address the preliminary approval requirements, mindful of this Court’s admonition
25 that it applies the same level of scrutiny to preliminary approval as it does final approval, the
26 Parties respectfully request a one-week extension to file the motion for preliminary approval.

27 ///

28 ///

IT IS HEREBY STIPULATED AND AGREED by the Parties that:

1. The proposed class action settlement agreement and motion for preliminary approval will be filed by June 30, 2017.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: June 23, 2017

Plaintiffs PHILLIP CORVELLO and
AMIRA JACKMON

Defendant WELLS FARGO BANK, N.A.

s/ Thomas J. O'Reardon II

Thomas J. O'Reardon II
BLOOD HURST & O'REARDON LLP

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LAW OFFICE OF PETER FREDMAN PC

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HAGENS BERMAN SOBOL SHAPIRO

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Matthew G. Ball
K&L GATES LLP

ECF CERTIFICATION

I, THOMAS J. O'REARDON, II, am the ECF User whose ID and password are being used to file this document and hereby attest that all signatories concur with this filing.

Dated: June 23, 2017

BLOOD HURST & O'REARDON, LLP

By: s/ Thomas J. O'Reardon II

Thomas J. O'Reardon II

~~(PROPOSED)~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 23, 2017


Hon. Vince Chhabria
United States District Judge